

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-00700006-2013**

Application Received: **May 3, 2012**

Plant Identification Number: **03-54-007-00006**

Permittee: **Equitrans, L.P.**

Facility Name: **Burnsville #71 Compressor Station**

Mailing Address: **P.O. Box 191, Burnsville, WV 26335**

Physical Location:	Burnsville, Braxton County, West Virginia
UTM Coordinates:	529.40 km Easting • 4301.40 km Northing • Zone 17
Directions:	From Charleston, take Interstate 79 North to the Burnsville Exit. Go to the Exxon station and turn left. Turn left at the next intersection. Stay on this road, as it passes the grade school and goes under the interstate.

Facility Description

The Burnsville Compressor Station #71 is a natural gas production and transmission facility covered by NAICS 48621 and SIC 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of one (1) 600-hp natural gas internal combustion reciprocating engine, two (2) 1350-hp natural gas internal combustion reciprocating engines, one (1) heating boiler, one (1) dehydration boiler, one (1) TEG dehydrator, one (1) dehydration flare, one (1) 251-hp natural gas fired electric generator, and six (6) tanks of various capacities.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2010 Actual Emissions
Carbon Monoxide (CO)	151.21	31.0
Nitrogen Oxides (NO _x)	327.01	248.5
Lead (Pb)	NA	0
Particulate Matter (PM _{2.5})	4.61	3.0
Particulate Matter (PM ₁₀)	4.61	3.0
Total Particulate Matter (TSP)	4.61	3.0
Sulfur Dioxide (SO ₂)	0.07	0.05
Volatile Organic Compounds (VOC)	27.30	9.7
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2010 Actual Emissions
Total HAPS	9.19	4.1
Benzene	0.36	NA
Ethylbenzene	0.10	NA
Toluene	0.45	NA
Xylenes	0.79	NA
n-Hexane	0.43	NA
Formaldehyde	5.10	4.1
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		
Other Regulated Pollutants	Potential Emissions	2010 Actual Emissions
CO _{2e}	13,436	NA

Title V Program Applicability Basis

This facility has the potential to emit 151.21 TPY of Carbon Monoxide and 327.01 TPY of Nitrogen Oxides. Due to this facility's potential to emit over 100 tons per year of criteria pollutant Equitrans, L.P. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.
	45CSR6	Open burning prohibited.
	45CSR10	To Prevent and Control Air Pollution from the Emission of Sulfur Oxides
	45CSR11	Standby plans for emergency episodes.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities.
	40 C.F.R. Part 63, Subpart ZZZZ	Stationary Reciprocating Internal Combustion Engines.
	40 C.F.R. Part 64	Compliance Assurance Monitoring
State Only:	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	45CSR4	No objectionable odors.
	45CSR17	To Prevent and Control Particulate Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
NA		

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

Emission Units Table, Section 1.1 was updated as follows: the emission point ID and control device ID for the TEG dehydrator was changed from “TEG” and “00C-02” to “FLARE” and “FLARE”. Since the emissions from the TEG dehydrator are routed to the Flare, this was corrected.

It was determined that the reciprocating engines (C-001, C-002, C-003, and G-001) become subject to 40 C.F.R. 63 Subpart ZZZZ on October 19, 2013. The applicable requirements for the engines are as follows:

- The permittee must comply with the general provisions of 40 C.F.R. 63 as shown in Table 8 of 40 C.F.R. Part 63 except for those sections listed in 40 C.F.R. §63.6645(a), which do not apply to engines C-002, C-003, and G-001. (Condition 4.1.1)
- The compressor engine C-001 is as 4-stroke, rich-burn, non-emergency SI unit greater than 500 hp at an area source and as such is subject to requirements for such from Tables 1b and 2d of 40 C.F.R. 63 Subpart ZZZZ (Conditions 4.1.2.a and 4.1.3).
- The compressor engines C-002 and C-003 are classified as 2-stroke, lean-burn, non-emergency, spark ignition units greater than 500 hp at an area source and as such are subject to the requirements for such from Table 2d of 40 C.F.R. 63 Subpart ZZZZ. (Condition 4.1.2.b)
- The Generator G-001 is classified as a 4-stroke, rich-burn, non-emergency, spark ignition unit less than 500 hp at an area source and as such is subject to the requirements for such from Table 2d of 40 C.F.R. 63 Subpart ZZZZ. (Condition 4.1.2.c)
- The permittee must demonstrate continuous compliance with each emission limitation or operating limitation in Tables 1b and/or 2d of 40 C.F.R. 63 Subpart ZZZZ that applies according to the appropriate methods from Table 6 of 40 C.F.R. 63 Subpart ZZZZ. (Condition 4.1.4)
- Compressor engines C-002 and C-003 and generator G-001 must comply with the monitoring requirements of 40 C.F.R. §§63.6625(e) and (h). (Conditions 4.1.5. and 4.1.6)
- Compressor engine C-001 must comply with the monitoring requirements of 40 C.F.R. §§63.6625(a), (b), and (h) and compressor engines C-002 and C-003 and generator G-001 must comply with the monitoring requirements of 40 C.F.R. §63.6625(j). (Conditions 4.1.6 and 4.2.1)
- Compressor engine C-001 must conduct the applicable performance tests specified in 40 C.F.R. §§63.6612, 63.6615, 63.6620, 63.6630(a) and (b) and Tables 3, 4, and 5 of 40 C.F.R. 63 Subpart ZZZZ. (Conditions 4.3.1, 4.3.2, 4.3.3, and 4.3.4)
- The permittee must comply with the recordkeeping requirements of 40 C.F.R. § 63.6655, except for 40 C.F.R. §§63.6655(c) and (f), which do not apply to any of the engines, and 40 C.F.R. § 63.6655(e) which does not apply to engine C-001. (Condition 4.4.1)
- Compressor engine C-001 must demonstrate initial compliance with the applicable emission and operating limitations as required by Table 5 of 40 C.F.R. 63 Subpart ZZZZ.
- The permittee must report each instance in which the applicable emission limitation or operating limitation in Tables 1b and/or 2d of 40 C.F.R. 63 Subpart ZZZZ were not met according to the requirements of 40 C.F.R. § 63.6650. (Condition 4.5.1)
- The permittee must report each instance in which the applicable requirements in Table 8 of 40 C.F.R. 63 Subpart ZZZZ were not met. (Condition 4.5.2)

- For compressor engine C-001 the permittee must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in 40 C.F.R. §63.6645. (Condition 4.5.3)
- For compressor engine C-001 the permittee shall comply with the reporting requirements of 40 C.F.R. § 63.6650 except for 40 C.F.R. §63.6650(g). (Condition 4.5.4)
- For compressor engine C-001 the permittee must comply with the notification requirements of 40 C.F.R. §63.6645. (Condition 4.5.5)

The changes made to Section 5.0 Source-Specific Requirements [Triethylene Glycol Dehydration (TEG) with Flare (FLARE), Heating Boiler (BLR), and Dehydration Boiler (DEHY) and emission point ID (FLARE, BLR, DEHY)] were mainly those required for MACT applicability purposes and updating old language.

- Condition 5.1.1 was modified and 5.1.1.(b) was removed. The benzene exemption under 40 C.F.R. 63 Subpart HH no longer applies to major sources of HAPs.
- Under MACT general provisions facilities defined as an area source of HAPs must conduct monitoring, testing, and reporting adequate to justify maintaining area source status. Since Burnsville #71 Compressor Station is an area source, this statement was added.(Condition 5.1.2)
- Condition 5.1.3 was previously condition 5.1.4 and was moved to keep the dehydration unit conditions grouped together. It was also modified by removing sections of the condition that pertained to using TEG emissions as fuel for the reboiler, which the Burnsville compressor station does not do.
- Condition 5.1.4 lists the provisions of 40 C.F.R. 63 Subpart HH which are applicable to the facility. This condition use to be part of 5.1.5.
- Condition 5.1.5 was added and states that if the facility exceeds the 0.90 megagram per year (1tpy) benzene exemption, then they will have to comply with the optimum glycol circulation rate provisions of 40 C.F.R. § 63.764(d)(2). (Condition 5.1.4)
- Condition 5.1.6 is the old condition 5.1.2 with a modified 5.1.6.(b) which streamlines 45CSR§6-4.3 and 45CSR§6-4.4.
- Condition 5.1.9 was added to incorporate the 45CSR§10-4.1 requirement stating that the facility cannot emit in-stack sulfur dioxide concentrations exceeding 2,000 parts per million by volume.
- Condition 5.1.10 was added to incorporate the 45CSR§10-5.1 requirement stating that the facility cannot combust gas containing hydrogen sulfide in a concentration greater than 50 grains per 100 cubic feet of gas except in the case of a person operating in compliance with an emission control and mitigation plan approved by the Director and the USEPA.
- Conditions 5.1.7, 5.1.8, 5.1.11, 5.1.12, and 5.1.13 use to be conditions 5.1.3, 5.1.6, 5.1.9, 5.1.10, and 5.1.11 respectively. The condition numbers were changed to keep flare conditions in a consecutive order.
- Condition 5.2.1 was modified to define what constitutes an excursion.
- Condition 5.2.3 and 5.2.4 are used to show compliance with the 45CSR§6-4.1(permit condition 5.1.8) hourly PM limit. This condition was modified to clarify this point.

- In condition 5.2.5 monitoring language was updated in order to better provide a means of collecting operating data sufficient to demonstrate compliance with the area HAP source status, as well as the 1 ton/yr benzene exemption threshold for subpart HH.
- CAM was addressed in the previous renewal, and the CAM plan is summarized in Section 5.7. However, there have been several additions with this permit renewal to clarify the CAM permit language.
 - Proper maintenance requirements as specified in 40 CFR § 64.7(b) (added as Condition 5.2.6).
 - Continued Operation requirements as specified in 40 CFR § 64.7(c) (added as Condition 5.2.7).
 - Documentation of Need for Improved Monitoring as specified in 40 CFR § 64.7(e) (added as Condition 5.2.8).
 - QIP requirements as specified in 40 CFR § 64.8 (added as Condition 5.2.9).
 - Response to Excursions or Exceedances as specified in 40 CFR § 64.7(d) (added as Condition 5.2.10).
- The testing condition 5.3.4 was modified to implement a testing frequency for the wet natural gas content entering the dehydration unit.
- Testing condition 5.3.5 was added to incorporate the area source, subpart HH, provisions for testing. This condition was previously included as part of condition 5.1.5.
- Condition was modified to reflect changes made in condition 5.2.1 to the definition of an excursion.
- The old 5.4.6 and 5.4.8 conditions have been combined as condition 5.4.6 and modified to require recordkeeping of all monitoring data, wet gas sampling, and GLYcalc emission estimates to show compliance with the emission limitations, HAP major source thresholds and the 1 ton per year benzene exemption.
- Condition 5.4.9 was added because under 40 C.F.R. §63.774(d)(1) records of the actual average benzene emissions as determined in accordance with 40 C.F.R. §63.772(b)(2) must be maintained.
- The reporting provisions of 5.5.5 were updated to accommodate the testing frequency specified in condition 5.3.4.
- Citations of permit conditions in the existing Section 5.7 CAM plan summary for Flare (FLARE) were updated.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR21	Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. Burnsville #71 station is not located in Cabell, Kanawha, Putnam, Wayne, or Wood counties that are affected by 45CSR21.
45CSR27	To Prevent and Control the Emissions of Toxic Air Pollutants. Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”
40 C.F.R 60 Subpart Dc	This subpart applies to steam generating units greater than 10 MMBtu/hr and less than 100 MMBtu/hr. Burnsville #71 Compressor Station does not have any steam

	generating units greater than 10 MMBtu/hr.
40 C.F.R. 60 Subpart GG	Standards of Performance for Stationary Gas Turbines. There are no turbines at the Burnsville #71 Compressor Station.
40 C.F.R. 60 Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Kb	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. All tanks are below 75 m ³ in capacity.
40 C.F.R. 60 Subpart KKK	Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants. Burnsville #71 Compressor Station is not engaged in the extraction of natural gas from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
40 C.F.R. 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO ₂ Emissions. There are no sweetening units at the Burnsville #71 Compressor Station.
40 C.F.R. 60 Subpart IIII	Standards of performance for Stationary Compression Ignition Engines. All engines at Burnsville #71 Compressor Station are spark ignition engines.
40 C.F.R. 60 Subpart JJJJ	This subpart applies to stationary spark ignition internal combustion engines that have been constructed, reconstructed, or modified after various dates, the earliest of which is June 12, 2006. All the engines at Burnsville #71 Compressor Station were installed before June 12, 2006 and have not been reconstructed or modified.
40 C.F.R. 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines. There are no turbines at the Burnsville #71 Compressor Station.
40 C.F.R 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities. The Burnsville #71 Compressor Station is not subject to Subpart HHH since the Burnsville's gas custody transfer is at an extraction facility and not to a natural gas transmission facility.
40 C.F.R 63 Subpart DDDDD	This MACT standard applies to industrial, commercial, and institutional boilers and process heaters at major sources of HAPs. Burnsville #71 Compressor Station is not major for HAPS.
40 C.F.R. 63 Subpart JJJJJ	This MACT standard applies to industrial, commercial, and institutional boilers at an area source of HAPs. All boilers at Burnsville #71 Compressor Station fire natural gas exclusively. Natural gas boilers are exempt from the rule per 40 C.F.R. §63.11195(e).
GHG Tailoring Rule	The facility is not a major GHG source and there have been no construction or modifications to trigger PSD or an increase of 75,000 tons per year of CO ₂ e. Therefore the GHG Tailoring Rule does not apply.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: December 18, 2012
 Ending Date: January 17, 2013

All written comments should be addressed to the following individual and office:

Robert Mullins
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Comments Received 12/28/2012 from Thomas Hadden with EQT.

1. 3.3.1 Stack Testing

Paragraph d of condition 3.3.1 describes Reporting Requirements related to stack tests.

The requirements stipulate a summary of conditions which form the basis for the evaluation, and a statement of compliance status. The current wording would require signatures on both of these report elements. EQT suggests the following revision to simplify this requirement and avoid the need to double-sign the reports, without altering the requirement in any substantive way:

The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: ~~the certification described in paragraph 3.5.1;~~ a statement of compliance status, ~~also signed by a responsible official; and,~~ a summary of conditions which form the basis for the compliance status evaluation; and the certification described in paragraph 3.5.1. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language.
2. The result of the test for each permit or rule condition.
3. A statement of compliance or non-compliance with each permit or rule condition.

Response: Condition 3.3.1.d requires the following: 1) the certification described in paragraph 3.5.1; 2) a statement of compliance status signed by a responsible official; and 3) a summary of conditions which form the basis for the compliance status evaluation. The certification described in 3.5.1. and the statement of compliance status may be submitted as one page in order to avoid the need to “double-sign the reports” as stated in in your comment. If these two elements were combined onto one page, you would need to have a statement which read “based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete” along with a separate statement of compliance status, but the signature by the responsible official could be for both statements on the same page. Since the concerns addressed by the commenter can be resolved without a change to condition 3.3.1.d, this requirement will remain unchanged.

2. 3.5.6 Semi Annual Reports:

The signature of the responsible official is redundant to requirement 3.5.1 and may be deleted. EQT requests that the line be deleted.

Response: The sentence in condition 3.5.6. which states “All required reports must be certified by a responsible official consistent with 45CSR§30-4.4” comes directly from 45CSR§30-5.1.c.3.A which is the underlying rule for this requirement. These conditions are required to be in the Title V permit per 45CSR§30-5.1. As such, the requested change will not be made.

3. 3.5.8.a.1. Deviations

The references to “certification by a responsible official”, or “submitted by the responsible official are unnecessary to the requirements at Condition 3.5.1 and may be deleted. EQT requests that the term be deleted in paragraphs a.1 and a.2.

Response: The sentence in condition 3.5.8.a.1 which states “ A written report of such deviation which shall include the probable cause of such deviations, and any corrective actions or preventive measures taken, shall be submitted and certified by a responsible official within (10) ten days of the deviation” comes directly from 45CSR§30-5.1.c.3.C.1 which is cited as the underlying rule for the requirement. These conditions are required to be in the Title V permit per 45CSR§30-5.1. As such, the requested change will not be made.

4. 3.5.8.a.2. Deviations

The report may be submitted by persons other than a responsible official. Although a deviation report must be certified, reference to submission by a responsible official should be deleted. EQT requests that the words “by a responsible official” be deleted.

Response: The sentence in condition 3.5.8.a.2 which states “ A written report of such deviation which shall include the probable cause of such deviations, and any corrective actions or preventive measures taken, shall be submitted and certified by a responsible official within (10) ten days of the deviation” comes directly from 45CSR§30-5.1.c.3.C.2 which is cited as the underlying rule for the requirement. These conditions are required to be in the Title V permit per 45CSR§30-5.1. As such, the requested change will not be made.

5. Source-Specific Requirements

These sections reproduce the compliance, reporting and testing requirements of subpart ZZZZ and does an outstanding job of identifying requirements and their applicability to the four engines. We note that applicability variably occurs in the requirement itself, or in parenthesis, following the citation of authority.

4.2.1.a. The requirement should contain the word “or” rather than “and”:

- a. For engine C-001: 40 C.F.R. §§ 63.6625(a) or (b);

Response: Confirmed that “or” should be used and this correction was made.

6. 5.2.1 Monitoring Requirements (Excursions)

EQT acknowledges the need to define what constitutes an excursion under a monitoring plan. We request the following minor change to clarify that an excursion only occurs during active operations of the dehy unit that could send flash gas to the flare:

Pilot flame absence while the dehy reboiler unit is in operation, indicates an excursion.

Response: The permit writer agrees to the clarification of when the pilot flame is necessary and the change will be made in the permit.

7. 5.2.5 Compliance

Minor typo “the the”.

GRI-GLYCalc version should be consistent throughout the permit. V4 is referenced in this condition and at 5.3.4. All other references use V3.

EQT understands that the increased detail of this requirement does not preclude the use of design data and parameters as model input where specific measurements are not available.

Response: The minor typo has been fixed. It is agreed that consistency needs to be maintained throughout the permit but GRI-GLYCalc V3 or higher will be used throughout, so as to maintain consistency both within the permit and with 40 C.F.R. §63.772(b)(2)(i). Therefore, in conditions 5.25 and 5.3.4 references to GRI-GLYCalc V4 Technical Reference User Manual and Handbook will be changed to read GRI-GLYCalc V3 or higher Technical Reference User Manual and Handbook.

8. 5.3.1 Visible Emissions Monitoring

The flare is designed, and effectively operates to produce no visible emissions at any time. EQT appreciates the use of Method 22 as an alternate to Method 9 to demonstrate visible emissions compliance, but objects to the use of a 2-hour observation period. The design and operating standard of 45 CSR §6-4-3 specify visible emissions shall not exceed 5-minutes in any 2-hour period.

Since this condition has been in the permit, visible emissions have not been observed to occur as a result of flare operations at this facility. We therefore request to sample a shorter observation period than the 2-hour period of the standard.

We propose as an alternative test, that the observation period should be at least 24 minutes. This test shall demonstrate no visible emissions are observed during the 24 minute period using 40 CFR Part 60 Appendix A, Method 22. Provided no visible emissions are observed during the 24 minute test, the flare shall be demonstrated as compliant with the standard. If any visible emissions, other than uncombined water vapor are observed during the 18-minute observation period, a full Method 22 analysis will be conducted using a 2-hour observation period, and the visible emission time will be separately accumulated using a stop-watch.

We believe this alternative approach represents an effective alternate monitoring/testing approach to verify the performance of the flare, without excessive use of personnel time to observe a source that never produces visible emissions. The alternative test is more stringent in that it encompasses a period during which up to one minute of visible emissions would be allowed, and the standard would be met; but the test fails if even an instantaneous visible emission is observed.

We would appreciate the opportunity to discuss further how we may demonstrate compliance with general requirement rules, by testing a sample of excessively long compliance periods such as this, using a shorter observation period.

Response: The 2 hour observation period is used because according to the definition of observation period in 40 C.F.R 60 Appendix A, Method 22, Section 3.4, the accumulated time period during which observation are conducted shall not be less than the period specified in the applicable regulation. In this case the applicable requirement is 5.1.6(b) which specifies 2 consecutive hours. Therefore the 2 hour time period will remain unchanged.

9. 5.4.1 Reporting Requirements:

EQT requests the condition be revised to include the phrase, “Except for periods of shutdown”, or similar language excepting periods where equipment is not operating and no gas is vented to the flare from being recorded.

Response: This request will maintain consistency with the requested change to section 5.2.1, therefore, language will be added so that only pilot flame absence while the dehy reboiler is in operation will need to be recorded.

10. 5.5.5 Dehydration Unit Emission Summary Report

The signature of the responsible official is redundant to the requirement at Condition 3.5.1.

Response: 45CSR§30-5.1.c.3.D states that “every report submitted under this section shall be certified by a responsible official.” The authority cited under condition 5.5.5 is 45CSR§30-5.1.c which requires certification by the responsible official. Although, this statement may be considered redundant with 3.5.1, it does not require action by the permittee other than what is already required by the underlying rule. No change will be made to condition 5.5.5.